

NAEA Ocean Peaking Power

Proposed Additional Issues

NAEA Ocean Peaking Power supports the Independent Market Monitor's 11/23/2010 Suggested Revisions to Rate Counsel's Proposed Issues List and recommends that they be adopted for the proceeding.

In addition, NAEA Ocean Peaking Power believes the following issues are an inseparable part of the Generic Proceeding, and proposes their addition to the list of Issues:

1. The criteria and process that the Board should establish to determine whether or not gas transportation rate discounts should be made available to electric generating customers, whether or not they can demonstrate bypass potential, based upon the impact of such discounts on retail electric rates.
2. The applicability of SBC, RGGI and CAC charges prospectively to electric generating customers who receive gas transportation discounts based upon the impact of such discounts on retail electric rates and the legality of a waiver or reduction of those charges.

NAEA Ocean Peaking Power notes that the Notice of the Generic Proceeding implies a broad purpose of the Board's investigation into gas transportation rate discounts. That gas transportation discounts could be authorized based upon criteria other than a generator's bypass potential is an issue that is clearly permitted in the Notice, which invites "comments on, *but not limited to,*" the specific issues listed in the Notice.